



DEPARTMENT OF ENVIRONMENTAL QUALITY

150 West Congress Street
Tucson, Arizona 85701-1317

Ursula Kramer
Director

(520) 740-3340
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April 18, 2008

Leslie Ramirez
Air Permits Office (AIR-3)
U.S. E.P.A. Region IX
75 Hawthorne Street
San Francisco, California 94105

Dear Ms. Ramirez:

Pursuant to Title 17 of the Pima County Code (§17.12.190.A.2), Pima County Department of Environmental Quality (PDEQ) is enclosing ASARCO's Non-Point Source Monitoring Plan for your review. Pursuant to Part B, Section II.D.2 of ASARCO's permit, the source developed this plan as a means of monitoring and recordkeeping for non-point, non-NSPS sources/ activities listed in Part B, Sections I.C.4 through 11.

ASARCO's permit states that this plan can only be incorporated in the permit through a significant revision to the permit if the plan was not part of the previous renewal application. There are no changes to the permit itself except the activation of the non-point source monitoring plan.

PDEQ believes that a 45-day review period is not necessary as the permit has not been revised in any way and is requesting that the 45-day review period be waived should EPA Region 9 not have any objections. Public comment period for the plan ended on April 10, 2008 and there have been no comments received.

If you have any questions or need additional information, please contact me at (520) 243-7347.

Sincerely,

A handwritten signature in black ink, appearing to read "Mukonde Chama", is written over a horizontal line.

Mukonde Chama, PE
Air Permits Supervisor

Enclosure: Non-point source monitoring plan and copy of permit revised April 2005.